## UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

IN RE VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION

**MDL No. 2875** 

THIS DOCUMENT RELATES TO ALL CASES

HON. ROBERT B. KUGLER MDL NO. 19-2875 (RBK)

## CERTIFICATION OF ADAM M. SLATER IN SUPPORT OF PLAINTIFFS' *DAUBERT* MOTION TO PRECLUDE THE DEFENSE EXPERT DAVID L. CHESNEY FROM OFFERING CLASS CERTIFICATION OPINIONS

## **ADAM M. SLATER**, hereby certify as follows:

- 1. I am an attorney at law within the State of New Jersey and a partner with the law firm of Mazie Slater Katz & Freeman, LLC, and serve as Plaintiffs' Co-Lead Counsel. I am fully familiar with the facts and circumstances of these actions. I make this Certification in support of Plaintiffs' motion to exclude the testimony of Janice K. Britt, Ph.D.
- 2. Attached hereto as **Exhibit 1** is a true and accurate copy of the deposition transcript of David L. Chesney in this case.
- 3. Attached hereto as **Exhibit 2** is a true and accurate copy of Stephen S. Hecht's expert report in this case.
  - 4. Attached hereto as **Exhibit 3** is a true and accurate copy of ZHP00190573.
- 5. Attached hereto as **Exhibit 4** is a true and accurate copy of the FDA's July 23 to August 3, 2018 Establishment Inspection Report.
- 6. Attached hereto as **Exhibit 5** is a true and accurate copy of David L. Chesney's report in this case.

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7. Attached hereto as **Exhibit 6** is a true and accurate copy of an excerpt of the deposition transcript of John L. Quick in this case.

MAZIE SLATER KATZ & FREEMAN, LLC

Attorneys for Plaintiffs

By: /s/ Adam M. Slater

Dated: May 3, 2022